

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division**

DANIKA YAMPIERRE

Plaintiff,

v.

BALTIMORE POLICE DEPARTMENT

Defendant.

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Case No.: 1:21-CV-01209-ELH

JOINT MOTION TO STAY PROCEEDINGS

The Parties, Plaintiff Danika Yampierre and Defendant the Baltimore Police Department, hereby jointly move this Court for an order staying this action pending the receipt of all Notices of Right to Sue for Plaintiff's underlying EEOC charges. A Proposed Order granting this Motion is attached hereto as Exhibit 1. As grounds for this Motion, the Parties state as follows:

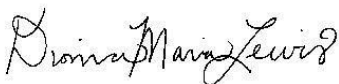
1. This action is based on Plaintiff's claims of discrimination, harassment, and retaliation by Defendant. Plaintiff has alleged that these are continuing actions, and has filed multiple related charges with the Baltimore EEOC office.
2. The Amended Complaint is predicated upon new and related Charges of Discrimination filed with the EEOC. ECF No. 13 ¶ 119, 122, 130.

3. Plaintiff has received a Notice of Right to Sue in EEOC charges No. 531-2020-02077 and No. 531-2021-03400, and is awaiting receipt of her Notice of Right to Sue in charge No. 531-2022-02617.¹
4. Plaintiff anticipates filing an amended complaint upon receipt of her Notice of Right to Sue for EEOC charge No. 531-2022-02617.
5. Accordingly, a stay of the proceedings pending receipt of the Notice is warranted in the interests of judicial economy and the Parties' interests in the efficient use of their own resources.

WHEREFORE, the Parties respectfully request that the Court stay this action for 75 days, pending the receipt of Plaintiff's Notice of Right to Sue for EEOC Charge No. 531-2022-02617. The Parties further intend to file a joint status report on or by Monday, January 9, 2023, informing the Court of the receipt of Plaintiff's Notice or the need for a further stay of the proceedings.

Dated: October 24, 2022

Respectfully submitted,



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Counsel for Plaintiff Danika Yampierre

¹ Plaintiff filed three separate EEOC Charges (531-2022-02617, 531-2022-02786, and 531-2022-03159), which the EEOC later merged into one Amended Charge for administrative efficiency under the number 531-2022-02617.

/s/

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